

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) LARRY M. GARDNER,)
Plaintiff,)
v.) Case No. 17-CV-00557-JED-FHM
(1) TRIAD PRECISION PRODUCTS,)
INC.,)
Defendant.)

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant, Triad Precision Products, Inc. (“Triad”) (“Defendant”), hereby removes the above-captioned action from the District Court of Tulsa County, State of Oklahoma, to the United States District Court for the Northern District of Oklahoma. In support of this removal, Defendant states as follows:

1. On September 13, 2017, Plaintiff, Larry M. Gardner (“Plaintiff”) commenced an action in the District Court of Tulsa County, Oklahoma, entitled *Larry M. Gardner v. Triad Precision Products*, Case No. CJ-2017-03631 (the “State Court Action”). A true copy of the state court docket sheet is attached as Exhibit 1. All process, pleadings, and orders filed or served in the State Court Action are attached hereto as Exhibits 2 and 3.

2. Upon information and belief, Plaintiff is an individual residing in Tulsa, Oklahoma. Defendant Triad Precision Products is a company organized under the laws of the State of Oklahoma

3. The Northern District of Oklahoma includes the state judicial district in which Plaintiff filed his Petition.

4. This is a civil action over which this Court has original jurisdiction based on federal question pursuant to 28 U.S.C. §1331, and which may be removed to this Court pursuant to 28 U.S.C. §§ 1441 and 1446.

5. Contemporaneous with Defendant's filing of this Notice, Defendant will serve written notice to Plaintiff's counsel of this filing, as required by 28 U.S.C. §1446(d).

6. Defendant shall likewise file a true and correct copy of their Notice of Removal with the Clerk of the District Court in and for Tulsa County, State of Oklahoma, as required by 28 U.S.C. §1446(d).

Respectfully Submitted,

JONES, GOTCHER & BOGAN, P.C.

/s/ Bradley J. Brown
Bradley J. Brown, OBA31003
James E. Weger, OBA 9437
3800 First Place Tower
15 East Fifth Street
Tulsa, OK 74103-4309
(918) 581-8200
(918) 583-1189 *facsimile*
jweger@jonesgotcher.com
bbrown@jonesgotcher.com
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Daniel E. Smolen, Esq.
Lauren G. Lambright, Esq.
SMOLEN, SMOLEN & ROYTMAN, PLLC
701 South Cincinnati Avenue
Tulsa, Oklahoma 74119
danielsmolen@ssrok.com
laurenlambright@ssrok.com
Attorneys for Plaintiff

/s/ Bradley J. Brown

Bradley J. Brown